

1 **LAW OFFICES OF DALE K. GALIPO**
2 Dale K. Galipo, Esq. (Bar No. 144074)
dalekgalipo@yahoo.com
3 Hang D. Le, Esq. (Bar No. 293450)
hlee@galipolaw.com
4 21800 Burbank Boulevard, Suite 310
Woodland Hills, California, 91367
Telephone: (818) 347-3333
5 Facsimile: (818) 347-4118

6 **LAW OFFICE OF STEWART KATZ**
7 Stewart Katz, State Bar #127425
555 University Avenue, Suite 270
Sacramento, California 95825
8 Telephone: (916) 444-5678

9 *Attorneys for Plaintiffs*

10

11 **UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA**

12

13 VERONICA MCLEOD, individually and as
14 successor in interest to decedent, DOLORES
15 HERNANDEZ; AMADO HERNANDEZ,
individually and as successor in interest to
16 decedent, DOLORES HERNANDEZ; and
YSIDRA REGALDO, individually,
17

18

Plaintiffs,

19

vs.

20

CITY OF REDDING; GARRETT MAXWELL,
an individual; MATTHEW BRUCE, an
individual; and DOES 2-10, inclusive,
21

22

Defendants.
23

24

25

26

27

28

Case No. 2:22-cv-00585-WBS-JDP

*Honorable William B. Shubb
Hon. Magistrate Jeremy D. Peterson*

DECLARATION OF HANG D. LE

DECLARATION OF HANG D. LE

I, Hang D. Le, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and the Eastern District of California. I make this declaration in support of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment or in the Alternative Summary Adjudication. I have personal knowledge of the facts contained herein and could testify competently thereto if called.

2. Attached hereto as “**Exhibit 1**” is a true and correct copy of the relevant portions of the January 19, 2023 Deposition of Garret Maxwell.

3. Attached hereto as "**Exhibit 2**" is a true and correct copy of the relevant portions of the December 4, 2020 Statement of Garret Maxwell for Internal Affairs Investigation 20-0033.

4. Attached hereto as “**Exhibit 3**” is a true and correct copy of the relevant portions of the April 27, 2023 Deposition of Matthew Bruce.

5. Attached hereto as "**Exhibit 4**" is a true and correct copy of the relevant portions of the December 4, 2020 Statement of Matthew Bruce to County of Shasta Sheriff's Office detectives.

6. Attached hereto as "**Exhibit 5**" is a true and correct copy of photographs taken of Matthew Bruce's injuries at the hospital after the incident.

7. Attached hereto as "**Exhibit 6**" is a true and correct copy of the relevant portions of the February 15, 2024 Deposition of Aiden Phillips.

8. Attached hereto as "**Exhibit 7**" is a true and correct copy of the relevant portions of the February 27, 2024 Deposition of Richard Bell.

9. Attached hereto as “**Exhibit 8**” is a true and correct copy of the relevant portions of the February 22, 2024 Deposition of Jennifer Hoberg.

10. Attached hereto as "**Exhibit 9**" is a true and correct copy of the Shasta County Sheriff Report of Autopsy of Dolores Hernandez.

11

11

11

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct. Executed this 13th day of May 2024 in
3 Woodland Hills, California.

4
5 
6
7

Hang Le

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28